



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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June 8, 2009

Dr. Stephen Martin  
Environmental Resource Section  
U.S. Army Corps of Engineers  
P.O. Box 3755  
Seattle, Washington 98124-3755

**Subject: Reauthorization Dredged Material Management Program Disposal Site  
Commencement Bay, Washington  
EPA Project Number 08-019-COE**

Dear Dr. Martin:

The U.S. Environmental Protection Agency (EPA) reviewed the supplemental draft Environmental Impact Statement (SEIS) for the *Reauthorization Dredged Material Management Program Disposal Site Commencement Bay, Washington*. EPA is a Cooperating Agency because of our responsibility for site designation under the Marine Protection, Research and Sanctuaries Act. Our review of the SEIS is in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The SEIS evaluates potential impacts associated with the continuation of disposal operations, and increasing the disposal site capacity to 23 million cubic yards (mcy) in Commencement Bay. This document supplements the 1988 EIS, which identified unconfined open water disposal sites in Puget Sound, including the Commencement Bay site. The alternatives analyzed in the SEIS are - Alternative 1, two coordinate shifts within the Target Area; Alternative 2, three coordinate shifts within the Target Area; and Alternative 3, No Action. Our comments focus on the Preferred Alternative (Alt 2).

We support the Preferred Alternative and we commend the Corps of Engineers' coordination with relevant agencies and stakeholders. We understand that this is one of the most monitored sites in the country and therefore, the data and analysis related to the in water disposal site is well documented. The main concern we have is related to the lack of information on air quality associated with dredging and potential impacts of climate change on the project. Due to concerns about potential impacts and lack of information on air quality and climate change we have given a rating of EC-2 (Environmental Concerns - Insufficient Information) to this project.

**Air Quality**

The SEIS analyzes the impacts to air quality from tug boat equipment. However, the EIS did not include an air quality analysis from dredging activities in the bay associated with the project. Because of this information gap, we have concerns about potential impacts to air quality.

The EIS discusses the baseline regional air quality and notes that a nonattainment rule for PM<sub>2.5</sub> in Tacoma was signed by EPA in December 2008. The EIS should also note that Tacoma is a maintenance area for PM<sub>10</sub>. The impacts from tug operations are demonstrated to be well below the significance threshold of 100 tons per year for air emissions; however, it is unclear what the contribution would be from dredging equipment and operation and maintenance activities. The Port of Tacoma is one of the key agencies utilizing this disposal site for maintenance dredging and expansion. We believe that the Port of Tacoma likely has a general management plan for dredging and that it would be beneficial to include a comprehensive analysis of future foreseeable actions. This analysis should include disclosing all air pollutant emissions and air quality impacts associated with the continuation of disposal at the site. The EIS should also demonstrate how general conformity would be achieved for PM<sub>10</sub> and PM<sub>2.5</sub> as required under 40 CFR § 93.153.

**Recommendation:**

*EPA recommends that the EIS analyze air quality impacts from dredging operations and how the project achieves general conformity.*

**Climate change**

Currently, there are concerns that continued increases in greenhouse gas emissions resulting from human activities contribute to climate change. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. EPA believes that the cumulative effects analysis in the NEPA document should include changes to resources that can reasonably be anticipated due to climate change that may have bearing on aspects of the project (e.g. changes in hydrology that may increase sediment). Therefore, we recommend that the EIS consider how resources affected by climate change could potentially influence the proposed project.

**Recommendation:**

*EPA recommends that the EIS include a discussion of potential climate change impacts on the proposed project.*

Thank you for the opportunity to comment on this supplemental draft EIS. If you would like to discuss our comments, please contact Lynne McWhorter at (206) 553-0205 or by electronic mail at [mcwhorter.lynne@epa.gov](mailto:mcwhorter.lynne@epa.gov).

Sincerely,

//s//

Christine Reichgott, Manager  
Environmental Review and Sediment Management Unit